



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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December 11, 2023

VIA E.C.F.


Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

The parties' request is GRANTED and the initial pretrial conference is hereby rescheduled for January 19, 2024, at 3 P.M. The parties are directed to dial into the Court's teleconference number at 888-251-2909, Access Code 2123101, and follow the necessary prompts at that time.

DATE: December 18, 2023

RE: Michael Andrews v. Kevin Rico, et al.,  
23 Civ. 06968 (LJL)

SO ORDERED.



LEWIS J. LIMAN  
United States District Judge

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department<sup>1</sup> and the attorney representing defendant the City of New York ("City") in the above referenced matter. The City writes, with the consent of all parties, to respectfully request a brief adjournment of the January 4, 2024 Initial Pretrial Conference to either: (a) January 11, 2024, January 17, 2024, or January 19, 2024, any time between 10:00 a.m. and 4:00 p.m.; or (b) another date convenient for the parties and the Court.

By way of relevant background, on December 4, 2023, the Court ordered, *inter alia*, "all parties to appear for an Initial Pretrial Conference by TELEPHONE on January 4, 2024, at 3:30 p.m." (Dkt. No. 19.) The Court further order that the parties "jointly submit to the Court a Case Management Plan and Scheduling Order" one week prior to the scheduled conference. (*Id.*)

However, the undersigned must attend a previously scheduled deposition for an unrelated matter on January 4, 2024, and thus, is unavailable on that date to participate in a conference. Specifically, this deposition concerns three separate matters and requires the availability of at least six separate attorneys and, therefore, the deposition cannot be easily rescheduled.

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<sup>1</sup> This case has been assigned to Assistant Corporation Counsel Zoe Reszytniak, who is not yet admitted to the New York State Bar. Ms. Reszytniak is handling this matter under my supervision and may be reached at (212) 356-2547 or zreszytn@law.nyc.gov.

Accordingly, the City respectfully requests, with the consent of all parties, a brief adjournment of the January 4, 2024 Initial Pretrial Conference to any time between 10:00 a.m. and 4:00 p.m. on either January 11, 2024, January 17, 2024, or January 19, 2024, or another date convenient for the parties and the Court.

The City thanks the Court for its time and consideration.

Respectfully submitted,

/s/ Nicolette Pellegrino  
Nicolette Pellegrino  
Assistant Corporation Counsel  
Special Federal Litigation Division

CC: VIA E.C.F.<sup>2</sup>  
Michael Andrews  
*Plaintiff Pro Se*

Eldar Mayouhas, Esq.  
*Counsel for NYC Health Hospitals Queens*

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<sup>2</sup> On August 7, 2023, Plaintiff consented to receive electronic service of filings via the E.C.F. system. (See Dkt. No. 3.)